

Feasibility
December 15, 2004

Long history of conversations

1998. Lower Snake EIS - NEPA analysis of water quality impacts of 3 alternative (EU-3) - Corps.
- Water Quality Plan - called for in 2000 Biological Opinion and used by DOJ in successful defense of Lower Snake CWA litigation -- called for WQ Plan
 - Columbia TMDL - never got specific into it - but in conversations on allocations - feasibility was elephant in living room nobody talked about
 - Bureau did preliminary feasibility study of Grand Coulee alternatives - June 2003

↳ where's the report?
+ Rick's analysis

Major issue in OR UAA work efforts

- EPA position - 1998 ANPRM - technological
- Elliot Rosenberg - support to OR and WA
- OR position including economic and technical
- WA - guidance document
- Extra meeting to discuss economic on Dec. 2 - great discussion - EPA OST on phone

Major issue of Federal dam operators

- Major focus of Nov. 4th OR UAA D.C. Interior/Corps/EPA meeting
- EPA asked to convene workgroup led by ML w/ support from Jennifer Wigal-OST to come up with common federal agreement on feasibility
- Corps has asked to engage OGC - EPA believes this to be a legal issue

Next Steps

- Further discussions and federal agreement - follow up meeting in January
- OR guidance
- WA guidance
- Pilot Federal Dam UAA
- Policy issue not a legal issue

1998

Listing of 1992 Fall Chinook triggered
need for ESA consultation for operation
of the Columbia River & Snake River
dams.

F.S. changing way dams are operated &
~~structure~~ structures altered

Ecology \Rightarrow developing technical & financial guidance for g(4).

Ecology & Oregon want to include economics!

Federal Workgroup on defining what \$ is "feasible"